

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS BEATTY,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.: 2:19-cv-00852-MJH-PLD
	)	
EQUIFAX INFORMATION SERVICES	)	
LLC, et al.,	)	
	)	
Defendants.	)	
_____	)	

**UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINE**

Defendant, Equifax Information Services LLC (“Equifax”), by its undersigned counsel, respectfully moves this Court for an order extending the discovery deadline through and including July 31, 2020. Equifax recognizes that the Court previously advised that additional extensions would be disfavored, but respectfully submits, as discussed below, that the circumstances impacting this case have substantially, and materially, changed since the Court entered its last order and another brief extension is warranted.

1. The current deadline for discovery is June 1, 2020. (Doc. 33.)
2. The parties were in the process of scheduling the final few depositions, but then the Covid-19 pandemic and its resulting closures occurred.
3. The pandemic has created substantial interference with the ability to prepare witnesses for deposition and schedule the last few depositions.
4. Further, Equifax is in the midst of transferring its representation in this case to Seyfarth Shaw as of May 1, 2020.
5. The new Equifax counsel will defend/take the remaining depositions and participate in the mediation.

6. The parties are working to confirm a date for mediation around July 14, 2020.

7. For these reasons, Equifax respectfully requests that the Court extend the discovery deadline through July 31, 2020 so that the remaining few depositions and mediation may be handled by the new Equifax firm under the circumstances created by the pandemic and the transition of counsel.

8. Plaintiff consents to the relief requested herein.

9. This request will not impact the other pretrial deadlines in the case.

10. This request is submitted in good faith and is not intended to cause delay, unnecessary burden, or needless expense, but rather to avoid the same.

WHEREFORE, Equifax requests that this motion be granted.

Respectfully submitted this 16th day of April, 2020.

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**CERTIFICATE OF SERVICE**

This is to certify that I have this 16th day of April, 2020 and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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